

Mark A. Nickel (SBN: 14082)  
Tyler J. Moss (SBN: 15685)  
**GORDON REES SCULLY MANSUKHANI, LLP**  
460 W. 50 N., Suite 500  
Salt Lake City, UT 84101  
Telephone: (801) 204-9990  
Facsimile: (385) 282-7590  
[mnickel@grsm.com](mailto:mnickel@grsm.com)  
[tmoss@grsm.com](mailto:tmoss@grsm.com)

*Attorneys for Defendants Greenfield Environmental Trust Group, Inc., and  
Greenfield Environmental Multistate Trust LLC, in its capacity as Trustee of the  
Multistate Environmental Response Trust*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH CENTRAL DIVISION**

---

MARC WEINREICH, an individual,  
  
Plaintiff,

v.

CYNTHIA BROOKS, an individual,  
GREENFIELD ENVIRONMENTAL  
TRUST GROUP, INC., a Massachusetts  
corporation; GREENFIELD  
ENVIRONMENTAL MULTISTATE  
TRUST LLC, a Delaware limited liability  
company, in its capacity as Trustee of the  
MULTISTATE ENVIRONMENTAL  
RESPONSE TRUST, a New York trust,

Defendants.

**STIPULATION RE: DEFENDANTS'  
DEADLINE TO FILE AN ANSWER  
OR OTHERWISE RESPOND TO  
THE COMPLAINT**

Case No. 2:19-cv-00953 PMW

Judge Paul M. Warner

---

**STIPULATION**

Pursuant to Fed. R. Civ. P. 6(b) and DUCiv 83-6, and for good cause, the parties hereby stipulate that the Defendants have until February 3, 2020 to file an answer or otherwise respond to the Complaint. A proposed and an agreed upon Order granting the parties' stipulation, as stated herein, is attached hereto as Exhibit A.

DATED this 5<sup>th</sup> day of December, 2019.

Respectfully prepared and submitted by:

**GORDON REES SCULLY  
MANSUKHANI, LLP**

/s/ Mark A. Nickel

Mark A. Nickel

Tyler J. Moss

*Attorneys for Defendants Greenfield Environmental  
Trust Group, Inc., and Greenfield Environmental  
Multistate Trust LLC, in its capacity as Trustee of  
the Multistate Environmental Response Trust*

Approved as to form by:

**ARENT FOX LLP**

/s/ Nicholas J. Nesgos<sup>1</sup>

Nicholas J. Nesgos, BBO# 553177

Lauren C. Schaefer, BBO# 696628

ARENT FOX LLP

Prudential Tower

800 Boylston Street, 32<sup>nd</sup> Floor

Boston, MA 02199-8004

(617) 973-6100

[Nicholas.nesgos@arentfox.com](mailto:Nicholas.nesgos@arentfox.com)

[Lauren.schaefer@arentfox.com](mailto:Lauren.schaefer@arentfox.com)

David Bayles, UBN# 8147

ARENT FOX LLP

Gas Company Tower

555 West Fifth Street, 48<sup>th</sup> Floor

Los Angeles, CA 90013

(213) 629-7406

[David.bayles@arentfox.com](mailto:David.bayles@arentfox.com)

*Attorneys for Defendant Cynthia Brooks  
(with permission to file on his behalf)*

Approved as to form by:

**PARR BROWN GEE & LOVELESS, P.C.**

---

<sup>1</sup> Mr. Nesgos' Pro Hac Vice application is forthcoming.

/s/ Rita M. Cornish

Jonathan O. Hafen (6096)

Rita M. Cornish (11293)

101 South 200 East, Suite 700

Salt Lake City, Utah 84111

(801) 532-7840

[jhafen@parrbrown.com](mailto:jhafen@parrbrown.com)

[rcornish@parrbrown.com](mailto:rcornish@parrbrown.com)

*Attorneys for Plaintiff Marc Weinreich  
(with permission to file on her behalf)*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 5, 2019, a copy of the foregoing **STIPULATION RE: DEFENDANTS' DEADLINE TO FILE AN ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT** was filed electronically with the Clerk of the Court using the Court's CM/ECF electronic filing system, which will send an electronic copy of this filing to all counsel of record.

/s/ Tyler J. Moss

Tyler J. Moss